

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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HEARING DATE: 11/16/17  
HEARING TIME: 9:30 a.m.  
HEARING PLACE: Binghamton, NY

In Re:

EDWARD V. MILLER,  
MARGARET A. MILLER,

SSN: xxx-xx-1966, xxx-xx-0426

Case No.: 17-60029  
Chap. 7

Debtors.

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**MOTION FOR EXTENSION OF TIME TO FILE COMPLAINT  
FOR DENIAL OF DISCHARGE**

L. David Zube, the moving party herein, respectfully alleges and shows this Honorable Court as follows:

1. This motion is brought pursuant to 11 U.S.C. § 727 and Rule 4004(b) of the Bankruptcy Rules of Procedure.
2. Your deponent is the duly appointed Chapter 7 trustee in the above-entitled proceeding.
3. Pursuant to Order of the Court dated 09/29/17, the time to file a complaint objecting to discharge is presently established as 10/12/17.

4. Your deponent has reason to believe that grounds for objection to discharge of the debtors herein may exist; however, your deponent has been unable to substantiate thoroughly this belief for the following reasons: the Trustee has requested documentation of insurance for the Debtors' real property, and addition of the Trustee as a named insured thereon, which has not yet been provided; the trustee requires the aforesaid information in order to protect and determine whether to administer property of this bankruptcy estate. The meeting of creditors has been repeatedly adjourned and is presently adjourned to 10/16/17 as of the date of this motion. Assuming that the Debtors do appear at this adjourned meeting and provide the requested material, there would remain very little time from that date to the present discharge bar date for the Trustee to complete his review.

5. Your deponent believes that it cannot be determined whether grounds exist for the denial of a discharge within the time period now in place for the filing of complaints, and believes that an additional ninety (90) days are necessary for that purpose.

6. This motion has been filed within the time period presently set for filing complaints objecting to discharge.

WHEREFORE, it is respectfully requested that the Court grant an extension of ninety (90) days from the date now in place within which complaints objecting to the discharge of the Debtors may be filed.

DATED: October 11, 2017.

/s/ L. David Zube  
L. David Zube, Trustee  
59 Court Street - 4th Floor  
Binghamton, New York 13901